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Attorneys for Mr. Julio Cesar Nunez-Gomez

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE LOUISA S. PORTER)

UNITED STATES OF AMERICA,

Plaintiff,

v.

JULIO CESAR NUNEZ-GOMEZ,

Defendant.

Case No. 08cr1559-H

DATE: June 10, 2008

TIME: 2:00 P.M.

**DEFENDANT'S RESPONSE AND
OPPOSITION TO MATERIAL WITNESS'
MOTION FOR VIDEOTAPED
DEPOSITIONS**

TO: KAREN P. HEWITT, INTERIM UNITED STATES ATTORNEY,
REBECCA KANTER, ASSISTANT UNITED STATES ATTORNEY, AND
THOMAS G. GILMORE, MATERIAL WITNESS ATTORNEY:

PLEASE TAKE NOTICE that on June 10, 2008, at 2:00 p.m., or as soon thereafter as counsel may
heard, defendant, Julio Cesar Nunez-Gomez, by and through his attorneys, Candis Mitchell and Federal
Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motion.

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MOTIONS

Defendant, Julio Cesar Nunez-Gomez, by and through his attorneys, Candis Mitchell and Federal Defenders of San Diego, Inc., asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order to:

(1) Detain Material Witnesses.

This motions are based upon the instant motion and notice of motion, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: May 28, 2008

s/ Candis Mitchell

CANDIS MITCHELL

Federal Defenders of San Diego, Inc.

Attorneys for Mr. Nunez-Gomez

Candis_Mitchell@fd.org